

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

UNIVERSAL CONNECTIVITY
TECHNOLOGIES INC.,

Plaintiff,

v.

LENOVO GROUP LIMITED,

Defendant.

Case No. 2:23-cv-00449-JRG

JURY TRIAL DEMANDED

P.R. 4-3 JOINT CLAIM CONSTRUCTION AND PREHEARING STATEMENT

Pursuant to Patent Rule 4-3 and the Court's Docket's Control Order (Dkt. No. 27), Plaintiff Universal Connectivity Technologies Inc. ("UCT") and Defendant Lenovo Group Limited ("LGL") hereby file this Joint Claim Construction and Prehearing Statement.

I. TERMS ON WHICH THE PARTIES AGREE [P.R. 4-3(A)(1)]

In accordance with Patent Rule 4-2(c), the parties met and conferred to narrow the list of disputed claim terms and phrases from their P.R. 4-1 lists and P.R. 4-2 exchange of preliminary claim construction and extrinsic evidence. However, at this time, the parties do not have any agreed constructions.

**II. PROPOSED CONSTRUCTIONS AND EXTRINSIC EVIDENCE FOR
DISPUTED TERMS [P.R. 4-3(A)(2)]**

The parties' competing proposed constructions, and the intrinsic and extrinsic evidence they cite to support their respective constructions, are set forth in the attached exhibits.

- **Exhibit A** provides a side-by-side comparison of the parties' competing proposed constructions for each disputed claim term, phrase, or clause in the patents-in-suit.
- **Exhibit B** includes UCT's identification of all references from the specification or prosecution history of the patents-in-suit, respectively, that support UCT's positions, as

well as an identification of any extrinsic evidence known to UCT on which it intends to rely either to support its position or to oppose any other party's position.

- **Exhibit C** includes LGL's identification of all references from the specification or prosecution history of the patents-in-suit, respectively, that support LGL's positions, as well as an identification of any extrinsic evidence known to LGL on which it intends to rely either to support its position or to oppose any other party's position.

III. CLAIM CONSTRUCTION HEARING LENGTH [P.R. 4-3(A)(3)]

The parties generally agree to abide by any time limits set by the Court with respect to the Claim Construction Hearing in this case. That being said, the parties anticipate that the Claim Construction Hearing for this case should not take longer than four (4) hours. The parties agree that time will be split equally between UCT and LGL.

IV. WITNESSES, INCLUDING EXPERTS, FOR THE CLAIM CONSTRUCTION HEARING [P.R. 4-3(A)(4)]

The parties do not expect to present live testimony of witnesses at the Claim Construction Hearing.

V. OTHER ISSUES [P.R. 4-3(A)(5)]

The parties are currently unaware of any other issues which might appropriately be taken up at a prehearing conference prior to the Claim Construction Hearing.

VI. EXPERT TESTIMONY [P.R. 4-3(B)]

Pursuant to Local Patent Rule 4-3(b), herewith today, each party is serving a disclosure of expert testimony consistent with Fed. R. Civ. P. 26(a)(2)(B(i)-(ii) or 26(a)(2)(C) for any expert on which it intends to rely to support its proposed claim construction or indefiniteness position or to oppose any other party's proposed claim construction or indefiniteness position.

Dated: February 19, 2025

Respectfully submitted,

By: /s/ Brett Cooper

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CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for Parties complied with the meet and confer requirement in Local Rule CV-7(h) on February 19, 2025, and the Parties are in agreement as to this Motion's substance, as indicated by the signatures of counsel for all Parties.

/s/ Brett Cooper
Brett Cooper

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A).

/s/ Brett Cooper
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